

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMAFull name and prison number  
of plaintiff(s)

v. Houston Co Jail, Houston Co

Sheriff Lamar ~~Glover~~ Glover, Houston

Co. Commissioners et al. W.B.

McCarty ~~Commander~~ Lt. K.

Romo &amp; Sheriff &amp; Co Commissioners

Name of person(s) who violated  
your constitutional rights.  
(List the names of all the  
persons.)

CIVIL ACTION NO.

(To be supplied by Clerk of  
U.S. District Court)

1:06-cv-961-WKW

## I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court  
dealing with the same or similar facts involved in this  
action? YES ( ) NO (X)B. Have you begun other lawsuits in state or federal court  
relating to your imprisonment? YES ( ) NO (X)C. If your answer to A or B is yes, describe each lawsuit  
in the space below. (If there is more than one lawsuit,  
describe the additional lawsuits on another piece of  
paper, using the same outline.)

## 1. Parties to this previous lawsuit:

Plaintiff(s) \_\_\_\_\_

N/A

Defendant(s) \_\_\_\_\_

2. Court (if federal court, name the district; if  
state court, name the county) \_\_\_\_\_

N/A

3. Docket number \_\_\_\_\_

4. Name of judge to whom case was assigned \_\_\_\_\_

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_

6. Approximate date of filing lawsuit \_\_\_\_\_

7. Approximate date of disposition \_\_\_\_\_

II. PLACE OF PRESENT CONFINEMENT Houston Co. JAIL, Houston Co.

Dothan, Al. 36301

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Houston Co JAIL  
Dothan Al.

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS. Dothan Al.

NAME

ADDRESS

901 E Main St. 36301

1. Sheriff Lamar Glair Houston Co JAIL
2. All County Commissioners Houston Co. Houston Co.
3. Commander W.B. McCarty Houston Co JAIL
4. Lt. K. Rocco Houston Co. JAIL
5. \_\_\_\_\_
6. \_\_\_\_\_

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED from 5-5-05

until current date (today) Oct 20 2006

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: The Condit & Unusual Conditions which Are Violating my rights & subjecting me to conditions which are A threat to my health, safety, well-being,

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

See enclosed Grievances

GROUND TWO: SAME AS ABOVE

SEE Grievances enclosed

SUPPORTING FACTS: \_\_\_\_\_

GROUND THREE: SAME AS ABOVE

SUPPORTING FACTS: SEE enclosed Grievances

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.  
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Rule in my favor to right the wrongs done to  
myself and all inmates at this jail & award me the  
sum of \$100,000 (one hundred thousand dollars) for punitive,  
declaratory & compensatory damages to myself & as well as for  
mental/physical suffering pecuniary anguish.

Thomas White  
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true  
and correct.

EXECUTED on Oct. 30th 2006.  
(Date)

Thomas White  
Signature of plaintiff(s)

Sept. 13<sup>th</sup> 2006

RECEIVED

To: Sheriff J. Glover  
Reg Thomas P. White  
DEBRA REAGAN ET AL  
COURT OF COMMON PLEAS  
& PROBATE DIVISION  
1983 Civil Suit

Against: Sheriff, Civil Admin  
Co. Commissioner Probate Judge.

Mr. Glover,

I am writing this letter to inform you that because of the conditions of the jail & current administration I am filing Civil Action suit. Mr. Glover, enclosed is just 2 (two) examples of the conditions & situations I am referring.

Mr. Glover, the food has constantly been full of bugs, never a well balanced diet - never appropriate amounts or portions, always odd.

The medication(s) are being passed out by simple Correction Officers (not Certified) & NOT by RUS or LPN's - Certainly should not be allowed to have inmates accompany the med craft & dispense, handle & package medication.

Also, The Law Library is not up to date. The Administration does not provide "indigent inmates" with copy service as they should.

Also, the Administration is not doing inmates due process by not Answering Grievance forms & Request forms. I am enclosing two (2) for proof.

(2)

Mr. Glarr, another problem here at the jail is how the Correction Officers are 'constantly' pulling their "Taser Guns" on inmates for no reason.

It would be another suit if (or when) ONE of your Officers "Tase" an inmate for "arguing" not threatening, or being violent.. Simply arguing with your officers. Mr. Glarr please instruct your Officers to "what" (exactly) it is permissible to use excessive force of this nature. So far they are using them as personal "toys" for "entertainment". Sheriff Clark, Sir I am writing this to you in all due respect to you as the Sheriff & as well as is "Human-Being", I feel you would not allow this to be going on if you were aware of it & most especially if it was a family member or loved one who is being subjected to these Wreckless & Negligent, unfair Conditions & unhealthy situations. Sir, I am respectfully requesting a response from you, or at the very least Mr. Glarr, please let me know you have got this. Thank you.

Respectfully,

Thomas P. White

#28827 Fpd

901 E Main St

Dothan Al. 36301

P.S. I've been incarcerated here since 5/5/05 & these conditions have become worse. Unbearable actually.

To:

County Commissioners  
Houston County  
Dothan, Alabama

Re:

Cruel/Unusual Conditions,  
Death Records,  
Civil Rights Violations.

To whom it may concern;

The purpose of this letter is to inform the Commissioners of situations at Co. cell. The food is & has been full of bugs, unbalanced meals & inadequate portions as mandated by Federal & State requirements. Several Grievances have been filed upon the food, yet it has only gotten worse. I am enclosing just 2(two) examples of this. But there are "numerous" other Violations as L.J.21. I am including a list of such in this letter. I have been incarcerated here at this cell since 5/5/05 & these conditions have & are only getting worse. I, & others have continued to file grievance forms, write requests & personally spoke with & pleaded to this administration to no avail. If anything the situation only gets worse. When we file grievances they are not answered. This is a violation of our "due process" & our rights.

The inmates housed within this facility are being treated as sub-human creatures & should not be subjected to those harsh cruel unusual conditions. The purpose of this letter is to make aware to

(2)

the Co.Commissioners of this situation & to set us a request by all inmates housed within the Houston Co. Jail to the Commissioners & to place with Commissioners to intervene & to remedy this problem so as to keep this from becoming a CIVIL LAW SUIT filed against Co.Commissioners, Sheriff, & Jail Administration for the conditions we are subjected to unfairly. These are only a "few" violations & conditions that are being imposed upon us & that which we are complaining of.

- ① Food has bags, inadequate diet, too small portions. Etc.
- ② Medication passed out by Correction Officers, not certified to handle meds & allowing "inmates" to accompany, med. cart.

Again, "library" not up to date, nor does Admin. Copy legal mail for indigent inmates.

- ③ No "GRIEVANCE" Procedure (proper) GRIEVANCES FILED but not answered.

④ Officers using "Taser Guns" for ENTERTAINMENT, AND to threaten inmates with "for NO valid REASON".

Again, these are only "some" of the problems we are asking that the Co.Commissioners look into these problems & interview "random" inmates as to the validity of this complaint & to remedy these unfair conditions so as to stop these problems before we are forced to file a

(3)

Civil Law Suit. We are being treated  
unfairly & subjected to cruel & unusual  
punishment as well as being deprived of  
our rights. We are not animals & should  
not be & will not be treated in this way.

We the undersigned, are witness to the  
above mentioned problems & are in agreement  
that the violations do exist & that we  
are being deprived of our rights &  
request something be done immediately  
to change this, or we will file suit.

Respectfully, us  
Sincerely, Sincerely yours,

Witness:

① James White  
② Greg Bix

③ Shirley Bass

④ Ronald Russell

⑤ Jennifer Kehler

⑥ Sue Crotts

⑦ Paul M. Conn

⑧ Dennis J. Lee

⑨ Lorrie Butler

⑩ D. P. K.

⑪ David Thompson

⑫ Doug Murray

⑬ Michael W. Miller  
⑭ Christopher Bore  
⑮ Diane Pritchard  
⑯ Maria J. Hadar

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DATE: Sept. 1<sup>st</sup>

## INMATE GRIEVANCE FORM

DATE: Sept. 1, 2001

**POD/CELL LOCATION:**

F-1 (4)

INMATE NAME: Thomas White

**INMATE NUMBER:**

28897

NATURE OF GRIEVANCE OR INFORMATION: I am filing this grievance because I've  
asked to have copies made of legal mail, & legal documents  
from Clerk of Court & appointed attorney that are proof of my rights  
being violated - I was told that this ADMINISTRATION "DOES NOT"  
make copies - only provides inmate with CARBON PAPER to make  
COPIES, well carbon paper isn't very good to copy letters  
from attorney or Clerk etc. I need copies made of my  
legal work, Federal & State Law says you WILL provide copy service  
to me if I need it badly.

WHAT DO YOU WANT TO HAPPEN TO SOLVE IT?

WHAT DO YOU WANT TO HAPPEN TO SOLVE IT? I AM AND INDIGENT IN WHAT I AM REQUESTING THAT THIS ADMINISTRATION PROVIDE ME WITH COPY SERVICE AS I AM ENTITLED TOO UNDER STATE & FEDERAL LAW I AM ALSO REQUESTING TO BE PROVIDED WITH A COPY OF THIS TO EXCLUDE YOUR RESPONSE & SIGNATURE FOR MY OWN PERSONAL RECORDS, THANK YOU.

## OFFICER RESPONSE OR FINDING?

**SGT. ON DUTY RESPONSE:**

**DATE GRIEVANCE RETURNED:**

**CORRECTIONS OFFICER SIGNATURE:**

**INMATE SIGNATURE:**

## INMATE GRIEVANCE FORM

Sept 1st

DATE: 2006

POD/CELL LOCATION:

F-10

INMATE NAME: Thomas White

INMATE NUMBER: 28827

NATURE OF GRIEVANCE OR INFORMATION: I am filing this grievance because of the law library, the law library is not up to date, does not have the most important books that is essential to the rights of inmates i.e., CRIMINAL RULES OF PROCEDURE, TITLE 13 & 14 PRISONERS RIGHTS HANDBOOK etc. The law library here is not of any benefit or use to inmates who desperately need (are guaranteed to) to have access readily available so as to help prepare for cases/trials etc.

WHAT DO YOU WANT TO HAPPEN TO SOLVE IT? to update law library, & to provide every possible documentation, book & memos to the benefit of all inmates to all incarcerated inmates housed at this facility. Again, this is a request to be entitled to, & provided to myself and all inmates housed here at this jail to have access to the = updated & current laws, procedures, guidelines by the state of Alabama & under Constitution of United States of America. I request copy of this with your response & signature please

OFFICER RESPONSE OR FINDING?

SGT. ON DUTY RESPONSE:

\*\*\*\*\* DO NOT SIGN UNTIL YOU HAVE READ RESPONSE \*\*\*\*\*

DATE GRIEVANCE RETURNED:

CORRECTIONS OFFICER SIGNATURE:

INMATE SIGNATURE:

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**LT. RECCO & COMMANDER McCARTY**  
**INMATE GRIEVANCE FORM**

DATE: Sept. 1<sup>st</sup>, 2006

**POD/CELL LOCATION:**

F-10

INMATE NAME: THOMAS WHITE

INMATE NUMBER: 28887

NATURE OF GRIEVANCE OR INFORMATION: The medication is being passed out not by nurses but by C.O.s which are not qualified to handle medication. Medication should be passed out ONLY by nurses or registered personnel, that are allowed by D.O.A. & FED laws. Common Correctional officers are not qualified, or competent to pass out federally guarded medication(s). Also a "trustee" certain should not be allowed to accompany med. cart. I AM REQUESTING A copy of this & your response to this for my personal records.

WHAT DO YOU WANT TO HAPPEN TO SOLVE IT? Only allow Registered Nurse, or LPN or ~~FEDERAL CERTIFIED COMPETENT~~ OFFICERS OFFICALLY AUTHORIZED TO HANDLE MEDICATION TO BE ABLE TO PASS OUT MEDICATION(S). THIS ADMINISTRATION IS IN DIRECT VIOLATION OF FEDERAL & STATE LAWS BY ALLOWING SIMPLE CORRECTIONS OFFICERS & TRUSTEES TO PASS OUT MEDICATION TO PACKAGE/HANDLE/DISPENSE MEDICATION.

I AM REQUESTING COPIES OF ALL GRIEVANCES I FILE TO BE ALLOWED TO INCLUDE YOUR RESPONSE ON MY COPIES ON ALL RESPONSES.

## **OFFICER RESPONSE OR FINDING?**

**SGT. ON DUTY RESPONSE:**

**DATE GRIEVANCE RETURNED:**

**CORRECTIONS OFFICER SIGNATURE:**

**INMATE SIGNATURE:**

## INMATE GRIEVANCE FORM

Sept. 11<sup>th</sup>

DATE

2006

POD/CELL LOCATION:

Food Class

INMATE NAME: Thomas White

INMATE NUMBER:

28827

NATURE OF GRIEVANCE OR INFORMATION: This grievance is being filed on behalf of all inmates housed within the Houston Co Jail. Today's "Dinner Meal" (6:00PM) WAS A DISGRACE TO ALL INMATES here at the jail. It consisted of Turkey Slices (bad) + less than one spoonful of Stuffing (about the size of a large egg), A spoonful of carrots + 1/2oz piece of "burned" cake. We, the inmates have repeatedly complained to this Administration, but to no avail or no change for the better - if anything of the food) has gotten worse. WE ARE NOT ANIMALS, AND will not tolerate being treated as ANIMALS or SUB-HUMAN creatures. The food is/has been full of bugs, UNBALANCED diet, INADEQUATE portions & NOWHERE close to Federal + State Guidelines.

WHAT DO YOU WANT TO HAPPEN TO SOLVE IT?  
 Either Fire ALL STEWARDS + REPLACE with COMPETENTLY, DEDICATED & Skilled who will "without fail", OVERSEE + SERVE better food, FREE of bugs + balanced meals, & Adequate amounts of we will enter into a CLASS ACTION LAW suit against Houston Co, i.e. CO JAIL, Administrator Lts & as well as Sheriff + CO Commissioners, attached to this grievance is list of WITNESSES who swear under oath that they all ARE & HAVE BEEN SUBJECTED TO ABOVE MENTIONED WRONG DOINGS

OFFICER RESPONSE OR FINDING:

SGT. ON DUTY RESPONSE:

\*\*\*\*\* DO NOT SIGN UNTIL YOU HAVE READ RESPONSE \*\*\*\*\*

DATE GRIEVANCE RETURNED:

CORRECTIONS OFFICER SIGNATURE:

INMATE SIGNATURE:

To: Lt. Rocco &amp; Commandant McCarty

## INMATE GRIEVANCE FORM

DATE: Sept. 4<sup>th</sup>

2006

POD/CELL LOCATION: F-402INMATE NAME: Thomas WhiteINMATE NUMBER: 28807

Sheriff Culver

+ Co Commissioners

NATURE OF GRIEVANCE OR INFORMATION: This grievance is being filed on behalf of all inmates housed within the Hennepin Co. Jail. Today's "dinner menu" (6:00pm) was an outrage to all inmates here at the jail. It consisted of: Turkey Slices (cold) + less than "one spoonful" of stuffing (A portion about the size of a large egg). A spoonful of carrots + one piece of banana cake." We the inmates here presented our complaint to this administration, but, to no avail or no change for the better. If anything - the food has gotten worse. We are not animals, and will not tolerate being treated as animals or sub-human creatures. The food has been/presently full of bugs. An unbalanced nutritional diet, "Inadequate Amounts - & Not the quality, quantity or types that Federal State Guidelines call for. We insist upon being treated with more respect fed as we should be."

WHAT DO YOU WANT TO HAPPEN TO SOLVE IT?

## WITNESSES:

~~Thomas P. White~~~~Curtis Mayes~~~~3 Travis Cummings~~~~4 Dennis Butler~~~~5 Brock Thompson~~~~6 Brad Culver~~~~7 Raymond K. Bryant~~~~8 Jeremy McKenzie~~

SGT. ON DUTY RESPONSE

~~9 Reginald Underwood~~~~10 Anthony Reese~~~~11 Marcos Dominguez~~~~12 Johnathan Kelley~~~~13 Johnny Owens~~~~14 David M. Cross~~~~15 Johnny Dozier~~~~16 Cornelius Whitehurst~~~~17 Romell Russell~~~~18 MARK FORD~~~~Sig Thomas White 58807~~~~Sig Curtis Mayes 13476~~~~Sig Travis Cummings~~~~Sig Dennis Butler 58912~~~~Sig Brock Thompson 58316~~~~Sig Brad Culver~~~~Sig Raymond K. Bryant~~~~Sig Jeremy McKenzie~~~~Sig SGT. On Duty Response~~~~Sig Reginald Underwood~~~~Sig Anthony Reese~~~~Sig Marcos Dominguez~~~~Sig Johnathan Kelley~~~~Sig Johnny Owens~~~~Sig David M. Cross~~~~Sig Johnny Dozier~~~~Sig Cornelius Whitehurst~~~~Sig Romell Russell~~~~Sig MARK FORD~~~~Sig David M. Cross~~~~Sig Christopher White~~~~Sig Reginald Underwood~~~~Sig Anthony Reese~~~~Sig Stewart Corbin~~~~Sig Stewart Corbin~~~~Sig Johnathan Kelley~~~~Sig Maurice Tyrell~~~~Sig Tony Rayson~~~~Sig Raynor Lewis~~~~Sig Dewayne Hines~~~~Sig~~~~Sig~~~~Sig~~~~Sig~~~~Sig~~~~Sig~~~~Sig~~~~Sig~~~~Sig Paul J. Gray~~~~Sig Christopher White~~~~Sig Reginald Underwood~~~~Sig Anthony Reese~~~~Sig Stewart Corbin~~~~Sig Stewart Corbin~~~~Sig Johnathan Kelley~~~~Sig Maurice Tyrell~~~~Sig Tony Rayson~~~~Sig Raynor Lewis~~~~Sig Dewayne Hines~~~~Sig~~~~Sig~~~~Sig~~~~Sig~~~~Sig~~~~Sig~~~~Sig~~~~Sig~~

\*\*\*\*\* DO NOT SIGN UNTIL YOU HAVE READ RESPONSE \*\*\*\*\*

DATE GRIEVANCE RETURNED: \_\_\_\_\_

CORRECTIONS OFFICER SIGNATURE: \_\_\_\_\_

INMATE SIGNATURE: \_\_\_\_\_

103rd Street &amp; Concourse

## INMATE GRIEVANCE FORM

DATE: Sept. 5th 2006 POD/CELL LOCATION: F-podINMATE NAME: Thomas White INMATE NUMBER: 238827

NATURE OF GRIEVANCE OR INFORMATION: I was on detent call today (9/5/06).... I WAS AT THE COURTHOUSE WAITING TO SEE JUDGE JACKSON, WHICH I COULD NOT HOLD MY URINE, I HAD TO HOLD IT FOR ALMOST 1 HOUR, I COULD NOT HOLD IT ANY LONGER - I ASKED THE OFFICER (OFFICER DUNNAM) TO PLEASE ALLOW ME TO GO TO THE RESTROOM. SHE REFUSED TO LET ME GO. I ASKED HER AGAIN PLEASE LET ME GO TO THE BATHROOM THAT I CANT HOLD IT ANY LONGER, OR AT LEAST CALL ANOTHER OFFICER TO TAKE ME SINCE SHE REFUSED. I THEN HAD TO ASK THE JUDGE (JACKSON) TO PLEASE INSTRUCT OFFICER DUNNAM TO TAKE ME OR HAVE ME TAKEN TO RESTROOM. JUDGE JACKSON DID NOT INSTRUCT THE OFFICER TO HAVE ME TAKEN TO RESTROOM. JUDGE JACKSON IS MY WITNESS TO THIS.

WHAT DO YOU WANT TO HAPPEN TO SOLVE IT?

I WOULD LIKE FOR OFFICER DUNNAM TO BE FIRED OR SUSPENDED FOR NOT ALLOWING ME TO USE RESTROOM & FOR PHYSICALLY ASSAULTING ME BY SHOVING ME TO MY CHAIR WHEN ALL I WAS DOING WAS TALKING WITH HER & JUDGE JACKSON TO ALLOW ME TO USE THE BATHROOM - I AM 41 YEARS OLD (NOT A CHILD) - I KNEW "WHEN" I HAD TO GO TO THE BATHROOM =

= I HAD TO GO TO THE BATHROOM. IF SHE ISN'T FIRED OR SUSPENDED I ASSURE YOU I WILL BE FILING 4583 CIVIL SUIT

OFFICER RESPONSE OR FINDING?

SGT. ON DUTY RESPONSE:

\*\*\*\*\* DO NOT SIGN UNTIL YOU HAVE READ RESPONSE \*\*\*\*\*

DATE GRIEVANCE RETURNED:

CORRECTIONS OFFICER SIGNATURE:

INMATE SIGNATURE:

## St. Router Commander INMATE GRIEVANCE FORM

DATE: Sept. 1st

2006

POD/CELL LOCATION: F-10INMATE NAME: Thomas WhiteINMATE NUMBER: 28807

NATURE OF GRIEVANCE OR INFORMATION: I am filing this grievance because of how the grievance/request procedure is in violation to the rules of procedure as mandated by both state & federal law. When an inmate files a grievance or request the officer gets "one" of the "two" copies back to inmate. This leaves inmate with a copy with "no response" for the inmate to keep for his own records. (2) Such is to have documented proof of negligence or whatever by dept. officials. It is a violation of Equal protection & our places which is "guaranteed" by both state & federal requirements.

WHAT DO YOU WANT TO HAPPEN TO SOLVE IT?

Either make grievance/requests forms in "triplicate" so as to allow administration 1 copy - inmates file/records 1 copy & also to provide 1 copy to inmate to keep for personal records/proof.

I've got 2(two) grievance forms that I've NEVER got a response to... why? Well, I suppose that the officer I filed grievance against threw them away, this is violating my rights & I AM requesting a copy of your response to this for my own records -

RESPECTFULLY, Thomas White

SGT. ON DUTY RESPONSE:

\*\*\*\*\* DO NOT SIGN UNTIL YOU HAVE READ RESPONSE \*\*\*\*\*

DATE GRIEVANCE RETURNED:

CORRECTIONS OFFICER SIGNATURE:

INMATE SIGNATURE: